

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE

| | | |
|---------------------------------------------|---|--------------------------------|
| NIKKI BOLLINGER GRAE, Individually and |) | Civil Action No. 3:16-cv-02267 |
| on Behalf of All Others Similarly Situated, |) | |
| |) | Honorable Aleta A. Trauger |
| Plaintiff, |) | |
| |) | [PROPOSED] ORDER GRANTING LEAD |
| vs. |) | PLAINTIFF'S MOTION TO COMPEL |
| |) | PRODUCTION OF IMPROPERLY |
| CORRECTIONS CORPORATION OF |) | WITHHELD DOCUMENTS |
| AMERICA, et al., |) | |
| |) | |
| Defendants. |) | |
| _____ |) | |

Having considered Lead Plaintiff's Motion to Compel Production of Improperly Withheld Documents (the "Motion"), the accompanying Memorandum of Law, the Declaration of Christopher M. Wood and exhibits thereto, the pleadings and filings herein and any additional materials and arguments as may be presented in further support of the Motion to the Court, IT IS HEREBY ORDERED that:

1. Plaintiff's Motion is GRANTED.
2. Defendants shall produce all documents withheld or clawed back as privileged pursuant to the attorney client privilege or work product doctrine, including any third party documents Defendants have prevented from being produced on these grounds, within seven days from the date of this Order.
3. Defendants shall reproduce without redaction all documents redacted as privileged, including any third party documents, within 14 days from the date of this Order.

IT IS SO ORDERED.

DATED: _____

THE HONORABLE ALETA A. TRAUGER
UNITED STATES DISTRICT JUDGE